

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG, INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES NOS.
1-50.

Defendants.

Civil Action No.
1:22-cv-00187-LJV-JJM

**DECLARATION OF
ARMAN ZAHOORY
IN SUPPORT OF
MOTION TO SEAL**

I, Arman Zahoory, under penalty of perjury and pursuant to 28 U.S.C. § 1746,
declare as follows:

1. I am an attorney with Latham & Watkins LLP, counsel to Defendant Skyryse, Inc.
I am familiar with this matter and the facts set forth herein.

2. I submit this Declaration in support of Skyryse's Motion to Seal, which seeks an
order permitting the filing under seal of limited excerpts of Skyryse's Reply In Support of its
Motion to Compel Production, filed on July 13, 2022.

3. Excerpts of Skyryse's Reply contain information which Plaintiff Moog, Inc. has
designated as Confidential. Specifically, Skyryse's Reply quotes portions of Moog's interrogatory
responses (ECF 166-3), which counsel for Moog has designated as "Confidential." In accordance
with these confidentiality designations, Skyryse seeks permission to provisionally file these
portions of Skyryse's Reply under seal.

4. The proposed redactions are narrowly tailored to protect such information.

Dated: July 13, 2022



Arman Zahoory